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6 *Attorneys for Defendant Target Corporation*

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 ANGELINA CARSON, individually,

10 Plaintiff,

11 vs.

12 TARGET CORPORATION, a foreign Corporation,
d/b/a TARGET and DOES I – X; and ROE
13 CORPORATIONS I – X, inclusive,

14 Defendants.

CASE NO.: 2:17-cv-00669-JCM-VCF

**STIPULATION AND ORDER TO
REMAND ACTION PURSUANT TO 28
U.S.C. §1447**

15 IT IS HEREBY STIPULATED by and between Sandy Van, Esq., of Van Law Firm,
16 attorneys for Plaintiff, Angelina Carson (hereinafter “Plaintiff”), and Kym Samuel Cushing, Esq. and
17 Douglas M. Rowan, Esq. of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, attorneys for
18 Defendant Target Corporation (hereinafter “Defendant”), that as the total value of damages in this
19 action does not exceed this Court’s required amount of SEVENTY-FIVE THOUSAND DOLLARS
20 and NO CENTS (\$75,000.00) necessary to maintain subject matter jurisdiction in this court, this
21 case shall be REMANDED to the Eighth Judicial District Court of Clark County, Nevada for all
22 further proceedings.

23 IT IS FURTHER STIPULATED between the parties that the total amount of damages which
24 Plaintiff seeks to recover in this action will not exceed SEVENTY-FIVE THOUSAND DOLLARS
25 (\$75,000.00).

26 IT IS FURTHER STIPULATED that Plaintiff WAIVES any right to collectively recover any
27 monies above and beyond SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00) in this action
28 against Defendant, resulting from the incident that occurred on November 27, 2015.

1 DATED this 16 day of June, 2017.

2 **WILSON, ELSER, MOSKOWITZ,**
3 **EDELMAN & DICKER LLP**

4 BY:

5 Kym Samuel Cushing
6 Nevada Bar No. 004242
7 Douglas M. Rowan
8 Nevada Bar No. 004736
9 300 South Fourth Street, 11th Floor
10 Las Vegas, Nevada 89101
11 *Attorneys for Defendant Target Corporation*

DATED this 13 day of June, 2017.

VAN LAW FIRM

BY:

Sandy Van, Esq.
Nevada Bar No. 010785
4170 South Decatur Blvd., Suite B-6
Las Vegas, NV 89103
Attorney for Plaintiff
Angelina Carson

9 **ORDER**

10 IT IS HEREBY ORDERED that pursuant to the agreement of the parties, as the value of this
11 case does not exceed the jurisdictional limits of this Court, this case is REMANDED to the Eighth
12 Judicial District Court of Clark County, Nevada for all future proceedings, pursuant to the terms
13 stipulated by the parties set forth herein.

14 IT IS FURTHER HEREBY ORDERED that pursuant to the agreement of the parties, the
15 maximum amount of damages which Plaintiff may recover in this matter is limited to SEVENTY-
16 FIVE THOUSAND DOLLARS and NO CENTS (\$75,000.00).

17 DATED June 22, 2017.

18 
19 UNITED STATES DISTRICT JUDGE

20 Prepared and Respectfully Submitted by:

21 **WILSON, ELSER, MOSKOWITZ, EDELMAN**
22 **& DICKER LLP**

23 BY:

24 Kym Samuel Cushing
25 Nevada Bar No. 004242
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